Julie,

The International Code Council (ICC) and the American Society of Agricultural and Biological Engineers (ASABE) have developed a new standard under ICC's American National Standards Institute (ANSI) approved standard development process. The ASABE/ICC 802-2014 Landscape Irrigation Sprinkler and Emitter Standard was developed to classify sprinkler and drip irrigation systems, set uniform testing procedures and establish minimum design and performance requirements for commercial and residential landscape irrigation emitters. The industry now has a standard that establishes this by defining and categorizing various types of devices, including sprays, rotors, multi-stream/multi trajectory nozzles, bubblers, drip emitters and micro sprays. It also addresses standardized test procedures for common test parameters including flow rate, distance of throw and uniformity. Importantly, it requires sprays to incorporate integral pressure regulation to optimize performance and reduce water consumption. A test method for the pressure regulation features ensures that these irrigation emitters meet minimum requirements for performance.

Representatives from several sprinkler manufacturers, the U.S. Environmental Protection Agency WaterSense Program, the Irrigation Association (IA), the Alliance for Water Efficiency, water utilities, landscape architects, regulators and academia all participated in on the development of this standard. It has truly been vetted by the same stake holders that have been involved in California. So many times we ask industry to help us but we do not give them the guidance to accomplish this properly. I believe that this standard accomplishes this.

We recommend a reference to the ASABE/ICC 802*Landscape Irrigation Sprinkler and Emitter Standard* be included under Section 492.13 *Irrigation Efficiency*. **The language would read as follows:**

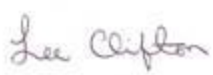
Sprinklers and emitters intended to dispense water from landscape irrigation systems onto a landscape shall comply with ASABE/ICC 802 *Landscape Irrigation Sprinkler and Emitter Standard*.

The final cost impact of this code proposal will be negligible when considering that you have obtained a more efficient irrigation system and the needed guidance for the manufacturer to produce an effective product that will save the consumer from using more water than necessary. Manufactures currently test but results are not comparable from manufacture to manufacturer. As a result the data that irrigation system designers use to create the systems may be not as reliable as it could be, resulting in overdesigning or under performance. These products are not presently third-party certified and adding this standard will raise the level of performance of the products and their quality. Other items that must be considered are as follow:

1. Adding uniform testing requirements will provide consumers with uniform data to allow them to make informed decisions on performance allowing apples to apples comparison of product performance. Marking requirements in the standard ensure that the proper information is provided to the consumer or specifier and presented in a form that allows product to be compared.
2. Increasing product performance requirements will raise durability and performance extending product life and reducing incidences of product failures that can result in significant water loss before detected and rectified.
3. Pressure regulation and testing requirements in the standard improve product performance, can correct for poor installation, and reduce water waste from inconsistent water application.

4. Provisions for microsprays and drip emitters promote increased product performance and promote the use of these water-saving products.
5. Test specifications for application rate and distribution uniformity ensure that product performance is determined using a standardized method allowing direct comparison of product performance.

These are all cost saving that are provide to the consumer. Thank you for the opportunity to provide a positive solution for the citizens of California.



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